

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION

IN RE: DIGITEK PRODUCTS LIABILITY LITIGATION

MDL NO.: 1968

This Document Relates to All Actions

APPLICATION OF E. KIRK WOOD FOR PSC

In accordance with Pretrial Order No. 2, please accept this application of the undersigned, E. Kirk Wood, to be a member of the Plaintiffs Steering Committee. I have filed nine Digitek cases in this MDL and will continue to file cases in this MDL. As set forth in support of this Application, I am willing and available to commit to this project, I have a proven ability to work cooperatively with others, and have the requisite experience in this type of litigation.

1. I am the founding attorney of Wood Law Firm, LLC. I have extensive experience in prosecuting and litigating complex pharmaceutical cases. A copy of my Firm Resume is attached hereto, along with a Certificate of Good Standing.

2. I obtained a Bachelor of Science degree from the University of Alabama in 1976. I obtained a Masters Degree from Troy University in 1984, and

I obtained a Juris Doctorate from Cumberland School of Law in 1987. My legal practice has focused on litigation on behalf of injured individuals and consumers.

3. I currently serve as Liaison Counsel for the Plaintiffs in the MDL No. 1985, *Total Body Formula Products Liability Litigation* MDL in the Northern District of Alabama, and am serving or have served on the Plaintiffs Steering Committees or Sub-Committees of the following MDL cases: MDL No.: 1785, *In Re: Bausch & Lomb Contact Lens Solution Products Liability Litigation*; MDL No.: 1953, *In Re: Heparin Products Liability Litigation*; and MDL No.: 1960, *In Re: Puerto Rico Cabotage Antitrust Litigation*. I have also been extensively involved and represent numerous clients in the following MDL cases: MDL No.: 1782, *In Re: Pharmacy Benefit Managers Antitrust Litigation*; MDL No.: 1838, *In Re: TJX Retail Security Breach Litigation*; MDL No.: 1988, *In Re: Countrywide Financial Corp. Mortgage Marketing and Sales Practice Litigation*, and MDL No.: 1657, *In Re: Vioxx Products Liability Litigation*.

4. Should the Court appoint me to the PSC, I intend to participate fully and cooperatively in the litigation and commit to doing everything possible to get the cases to trial. I believe I have the resources and experience to assist the plaintiffs in this process to the benefit of all of the clients.

Dated: May 14, 2009

Respectfully submitted,

/s/ E. Kirk Wood

E. Kirk Wood, Jr.

WOOD LAW FIRM, LLC

P. O. Box 382434

Birmingham, Alabama 35238-2434

Telephone: (205) 612-0243

FIRM RESUME

**E. Kirk Wood
Managing Partner
Wood Law Firm, LLC
PO Box 382434
Birmingham, AL 35238
(205) 612-0243
Ekirkwood1@cs.com**

EDUCATION:

BS, University of Alabama 1976
MS, Troy University 1984
JD, Cumberland School of Law 1987

LICENSED:

Alabama Bar
Florida Bar

CERTIFICATION:

Certified Player Representative, National Football League Players Association
Certified Player Representative, Canadian Football League Players Association

INSTRUCTION:

Adjunct Professor of Law, University of Alabama, 1992

ADMITTED:

Supreme Court of Alabama
Supreme Court of Florida
US District Court for the Northern District of Alabama
US District Court for the Middle District of Alabama
US Court of Appeals for the Eleventh Circuit

Page Two, Wood Law Firm, LLC, Firm Resume

MEMBER:

American Bar Association
Alabama Bar Association
Florida Bar Association
Birmingham Bar Association
Federal Bar Association

RECENT REPRESENTATIVE MULTI DISTRICT LITIGATION MATTERS:

In re: Pharmacy Benefit Managers Antitrust Litigation
In re: TJX Retail Security Breach Litigation
In re: Vioxx Products Liability Litigation
In re: Bausch & Lomb Contact Lens Solution Products Liability Litigation (Plaintiffs Steering Committee)
In re: Heparin Products Liability Litigation (Plaintiffs Steering Committee)
In re: Total Body Formula Products Liability Litigation (Liaison Counsel; Plaintiffs Executive Committee)
In re: Puerto Rico Cabotage Antitrust Litigation (Plaintiffs Steering Committee)

Northern District of Alabama

Office of the Clerk

Room 140, 1729 5th Avenue North

Birmingham, Alabama 35203

(205) 278-1700

Sharon Harris
Clerk

CERTIFICATE OF GOOD STANDING

I, **Sharon Harris**, Clerk of the United States District Court, Northern District of Alabama,

DO HEREBY CERTIFY that **E. KIRK WOOD, JR.**, was duly admitted to practice in said Court on JULY 30, 2003, and is in good standing as a member of the bar of said Court.

Dated at Birmingham, Alabama, on May 14, 2009.

SHARON HARRIS, CLERK

By: Albert B. Coleman
Deputy Clerk